

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-cr-30004-MAP
)	
ROOSEVELT ARCHIE,)	
Defendant.)	
)	

JOINT MOTION FOR A CONTINUANCE

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, and the Defendant, through his counsel Attorney Vincent Bongiorno, respectfully move for a brief continuance in the above-captioned matter. The case is currently scheduled for Defendant's change of plea on July 11, 2005. On July 8, 2005, Attorney Bongiorno proposed changes to the government's plea agreement. This recent development necessitates a meeting between the Defendant and his counsel and the government. The parties will schedule this meeting for the week of July 11, 2005. The parties respectfully request this Court to continue the matter until July 18, 2005.

The Defendant has waived his claim to the Speedy Trial Act for any time granted due to this continuance.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul Hart Smyth

Paul Hart Smyth

Assistant U.S. Attorney

/s/ Vincent Bongiorno
Vincent Bongiorno
Counsel for Defendant

Dated: July 9, 2005

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
July 6, 2005

I, Paul Hart Smyth, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by mail to Attorney Vincent Bongiorno, 95 State Street, Springfield, MA.

Paul Hart Smyth
Assistant U.S. Attorney